

THE HONORABLE LAUREN KING

UNITED STATES OF DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LEO'S WELDING and FABRICATION, LLC, a
Washington limited liability company,

Plaintiffs,

v.

HANNAH, Official Number 1067457, her
machinery, engines, equipment, cargo
appurtenances, *in rem* and SAYAK
LOGISTICS, LLC, an Alaska limited liability
company dba NORTHLINE SEAFOODS *in*
personam,

Defendants.

Case No. 2:25-cv-00625 MLP

**JOINT STATUS REPORT
AND STIPULATION FOR
SPECIAL BOND**

The Parties, in accordance with the Court's Order, Dkt. No. 23, jointly report that they have agreed on terms for a Special Bond as alternate collateral for the lien claim of Plaintiff in this matter, as set forth in this Stipulation. In light of this, the Parties are of the view that the Hearing now set for Friday, May, 9, 2025 at 11 a.m. may be dispensed with if agreeable with the Court.

In accordance with Federal Rules of Civil Procedure – Supplemental Rules of Certain Admiralty and Maritime Claims, and Western District of Washington Local

Admiralty Rules the Parties hereby file this Stipulation for Special Bond for the HANNAH, Official Number 1067457, her machinery, engines, equipment, cargo appurtenances (the “Vessel”). The owners of the Vessel, by and through counsel, will file a Special Bond of ONE MILLION THREE HUNDRED SEVENTY EIGHT THOUSAND DOLLARS (USD \$1,378,000.00) (the “Security”), with the Clerk of Court for the United States District Court for the Western District of Washington, made payable to the Clerk of Court for the United States District Court for the Western District of Washington. The Special Bond shall serve as substitute res for the Vessel. Plaintiff accepts the Special Bond as substitute res for the Vessel. In the event a final judgment is entered in Plaintiff’s favor in the above captioned action for Plaintiff’s maritime lien claim, this Court shall direct the Clerk to pay to Plaintiff and satisfy a final judgment in its favor for its lien claim up to and not exceeding ONE MILLION THREE HUNDRED SEVENTY EIGHT THOUSAND DOLLARS (USD \$1,378,000.00) or any lesser amount decreed by the Court. The Parties further agree that the Court shall not release the Special Bond before a final judgment in the above captioned action has been rendered or a settlement has been agreed between the Parties, as evidenced by a stipulation of settlement filed by the Parties. This Special Bond shall be effective upon delivery of the Security to the Clerk of Court for the United States District Court for the Western District of Washington. This Special Bond is being filed in accordance with the provisions of Supplemental Admiralty Rule E(5). Upon delivery of the Security to the Clerk, the Parties agree that the Order for Warrant of Arrest for the Vessel, Dkt. No. 23, shall be of no further effect, and the Clerk and the Marshal are hereby directed to take no further action with respect to the arrest of the Vessel pending further order of this Court.

I certify this memorandum contains 418 words, in compliance with Local Civil Rules.

DATED this 6th day of May, 2025.

HOLMES WEDDLE & BARCOTT, P.C.

/s/ Michael A. Barcott
Michael A. Barcott, WSBA #13317

/s/ John E. Casperson
John E. Casperson, WSBA #14292

/s/ Daniel P. Barcott
Daniel P. Barcott, WSBA #50282
3101 Western Ave, Suite 500
Seattle, WA 98121
Phone: 206.292.8008
Email: mbarcott@hwb-law.com
jcasperson@hwb-law.com
dbarcott@hwb-law.com
Attorneys for Defendant Sayak Logistics,
LLC d.b.a. Northline Seafoods

/s/ Brian C. Zuanich
Brian C. Zuanich, WSBA #43877

/s/ Robert Zuanich
Robert Zuanich, WSBA #9581
Zuanich Law PLLC
U.S. Bank Center
1420 5th Avenue, Suite 2200
Seattle, WA 98101
Email: brian@zuanichlaw.com
rpz@zuanichlaw.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury of the laws of the State of Washington that, on the 6th day of May 2025, at Seattle, WA, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Attorneys for Plaintiff:

Brian C. Zuanich, WSBA #43877 - brian@zuanichlaw.com
Robert Zuanich, WSBA #9581 - rpz@zuanichlaw.com
Zuanich Law PLLC, 1420 5th Avenue, Ste. 2200, Seattle, WA 98101

/s/ Karla R. Lavoie
Karla R. Lavoie, Legal Assistant

JOINT STATUS REPORT AND STIPULATION FOR SPECIAL BOND- 3
Case No. 2:25-cv-00625

HOLMES WEDDLE & BARCOTT, PC
3101 WESTERN AVENUE, SUITE 500
SEATTLE, WA 98121
TELEPHONE (206) 292-8008 | FAX (206) 340-0289